

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF VIRGINIA

ELIZABETH SINES ET AL. : Case No. 3:17-CV-72

Plaintiff : Judge MOON  
Mag. Judge HOPPE

:

-v-

JASON KESSLER ET AL. :

:

Defendants

---

**ANSWER TO PLAINTIFF'S SECOND AMENDED COMPLAINT**

---

Defendants Jason Kessler, Nathan Damigo, Matthew Parrott, Identity Evropa (“IE”), and Traditionalist Worker Party (“TWP”), (“Answering Defendants”) state their Answer to Plaintiff’s Second Amended Complaint as follows:

1. Denied.<sup>1</sup>

---

<sup>1</sup>In this Answer, where a particular Answering Defendant makes an admission or denial it is admitted or denied by all based solely on the knowledge of that particular answering defendant and to the limits of said defendant’s knowledge. The phrase “or ratifying” is included in each factual denial as if fully typed in. It was occasionally omitted in earlier versions of this pleading and the omission has not been corrected.

2. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.
3. Answering Defendants deny the allegations in the first sentence of this paragraph; are without knowledge or information sufficient to form a belief as to the truth of the allegations in the second sentence of this paragraph, and on that basis, deny those allegations except that it is denied any Answering Defendant is a “Klansmen”; are without knowledge or information sufficient to form a belief as to the truth of the allegations in the third and fourth sentences of this paragraph, and on that basis, deny those allegations; admit that Parrott brought shields and flagpoles, that Identity Evropa brought signs and/or flagpoles, deny any other allegation in the fifth sentence of this paragraph; are without knowledge or information sufficient to form a belief as to the truth of the allegations in the sixth sentence of this paragraph, and on that basis, deny those allegations, except that Kessler admits that persons chanted the listed phrases or something similar on August 11, 2017; and deny the remaining allegations in this paragraph.
4. Answering Defendants deny the allegations in this paragraph, admit the listed quotes in the remainder of the paragraph are accurate or that something similar was posted to the internet, but deny the remaining allegations in this paragraph.
5. Denied.
6. Denied as factually inaccurate and denied for want of sufficient knowledge as to the alleged quote of a politician.

7. This paragraph does not a response from Answering Defendants.
8. Admitted.
9. Admitted.
10. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.
11. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.
12. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.
13. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.
14. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.
15. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.

16. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.
17. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.
18. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.
19. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.
20. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except Jason Kessler denies he is a white nationalist, denies he is a member of the proud Boys but asserts he attempted to join Proud Boys in 2017, admits he uses or has used the internet handles listed, was an organizer for Unite the Right, founded Unity and Security for America, contributed to VDare and Daily Caller, was featured on a promotional poster, got in a fight with a man in January 2017 and subsequently pled guilty to a misdemeanor charge resulting therefrom, and was charged with perjury, and has collected petition signatures as alleged.

21. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.
22. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except Answering Defendants admit Christopher Cantwell hosts “Radical Agenda”.
23. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except that they admit Mr. Fields has been convicted of murdering Heather Heyer..
24. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.
25. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except they admit Anglin is the publisher of the Daily Stormer and that said publication posted the poster alleged or something similar.
26. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except they admit the fundraising post alleged or something similar was posted.

27. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except they admit Robert Ray is connected with the Daily Stormer and was present in Charlottesville at relevant times.
28. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except Nathan Damigo admits he was resident of California, was a member of Identity Evropa, punched the woman called "Moldylocks" in April 2017 in Berkeley and made the statement attributed to him or something similar. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations about what Richard Spencer did or didn't say, and on that basis, deny those allegations.
29. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except they admit Mosley was a planner of Unite the Right and was a member and officer of defendant Identity Evropa at relevant times.
30. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except Identity Evropa admits the general description given of it in this paragraph is passably accurate with the exception of the allegation and implication of any supremacism.

31. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except Parrott and TWP admit Heimbach was a leader of TWP and Traditionalist Youth Network, was familiar with Jeff Schoep and Nationalist Front, made the Hitler statement or something similar, and led TWP on August 12.
32. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except that Matthew Parrott admits the paragraph is passably accurate as to his title within TWP and as to his internet posting(s) regarding August 12, 2017.
33. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, except Parrott and TWP admit they are a political entity registered with the FEC, admit TWP was founded by Heimbach and Parrott, admits the quoted language is reasonably accurate, and denies as factually inaccurate the allegation that violence engaged in was wrongful or unlawful in the last sentence of this paragraph.
34. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.

35. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.
36. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except they deny as factually inaccurate the implicit allegation of unlawful violence.
37. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.
38. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.
39. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, except that Parrott and TWP deny the allegation that Nationalist Front was “led by” the listed individuals, admit Nationalist Front was supposed to be a way for disparate pro-white groups to cooperate on individual projects should they choose to do so, and deny as factually inaccurate allegations of wrongful violence or intimidation.
40. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that

basis, deny those allegations except they admit they are aware of the participation of Mr. Invictus in the rally.

41. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.
42. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.
43. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except they deny as factually inaccurate allegations of conspiracy or wrongful violence.
44. Denied.
45. Denied except that Answering Defendants are aware of the “summer of hate” meme on Daily Stormer.
46. Answering defendants deny the allegations in this paragraph except they admit the Lee statue issue was relevant to the decision to rally in Charlottesville.
47. Answering defendants deny the allegations in this paragraph except they admit the Lee statue issue was relevant to the decision to rally in Charlottesville.
48. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except that Jason Kessler denies as factually inaccurate the allegations of intimidation in this paragraph.

49. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except that Jason Kessler, Nathan Damigo, Identity Evropa, and TWP admit the description of signs carried and chants verbally made, as distinct from what WW2 era Nazi government policy or philosophy was, is substantially accurate.
50. Denied as factually inaccurate except that Jason Kessler admits the statements attributed to him in quotes are substantially accurate.
51. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except that Damigo and Kessler admit that they are aware the quoted statement was made if not by Spencer than by a different speaker at a luncheon type event.
52. Answering Defendants deny as factually inaccurate the allegations in this paragraph except they admit they are aware that the Daily Stormer published the language indicated.
53. Answering Defendants deny as factually inaccurate the allegations in this paragraph except they admit they are aware that the May event has been referred to as indicated.
54. Answering Defendants deny as factually inaccurate the allegations in this paragraph except they admit Jason Kessler applied for a permit and that lawful event planning began prior to August 2017.

55. Answering Defendants deny as factually inaccurate the allegations in this paragraph except Jason Kessler admits the “Proud Boys” were invited and the statements in quotes are substantially accurate.
56. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except that Jason Kessler admits he witnessed the July 2017 event and it’s description in this paragraph is substantially accurate.
57. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.
58. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except that Jason Kessler admits the allegations in this paragraph.
59. Answering Defendants deny all allegations in this paragraph as factually inaccurate.
60. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, except that Kessler admits the explicit content of his permit application is accurate as far as stated in this paragraph and all Answering Defendants deny all allegations in paragraph as to their own activities and intentions.

61. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.
62. Answering Defendants deny all allegations in this paragraph as factually inaccurate.
63. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except Damigo and IE believe McLaren did meet with Spencer but assert they are unaware of the agenda or occurrences at this meeting.
64. Denied as factually inaccurate.
65. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except that Jason Kessler denies the allegations in this paragraph as factually inaccurate.
66. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except that TWP denies the allegations in this paragraph as factually inaccurate.
67. Answering Defendants deny as factually inaccurate the allegation in this paragraph that they used the internet to conspire to commit any wrongful or unlawful acts but admit it was used for lawful event planning.

68. Answering Defendants deny all allegations in this paragraph as factually inaccurate.
69. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except that Answering Defendants deny all allegations in this paragraph as factually inaccurate. Damigo and Identity Evropa deny as factually inaccurate the allegation allegedly attributed to defendant Spencer.
70. Answering Defendants state that the Discord site and how it works speaks for itself.
71. Answering Defendants admit a Charlottesville server was set up on Discord, deny as factually inaccurate the remainder of the allegations in this paragraph as to their own activities and deny due to lack of knowledge or sufficient information as to others, but admit that some lawful event planning did occur on the Discord.
72. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except that Jason Kessler admits he was a moderator on a relevant Discord channel and that it was invite only and he could view and delete posts in this channel.
73. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that

basis, deny those allegations except that all Answering Defendants deny any allegations of a conspiracy.

74. Answering Defendants deny as factually inaccurate the allegations in this paragraph that any unlawful conspiring or activity was perpetrated by them on the Discord but Answering Defendants admit lawful event planning occurred on the Discord. Kessler, Damigo, and IE admit that Mosley posted the documents listed.
75. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except that they admit, to the best of their ability at this time, there was more than one channel dedicated to lawful planning of the Rally on Discord and, generally speaking, there were certain leadership channels as alleged though not necessarily titled as alleged.
76. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except that Answering Defendants admit that there were private channels on Discord for Rally planning as to specific groups.
77. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except that Jason Kessler admits the indicated persons all participated in or were referenced on Discord and Kessler further

admits a transportation discussion, as distinct from an actual plan, was engaged in with the poster known as Tyrone.

78. Denied as factually inaccurate except that Jason Kessler admits lawful promotional material was shared on Discord.
79. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except that all Answering Defendants deny any allegations of a conspiracy and Jason Kessler admits the listed hashtags were used on Twitter.
80. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except that all Answering Defendants deny any allegations of a conspiracy.
81. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis deny those allegations except that they are aware that the listed group had a Discord server.
82. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, deny as factually inaccurate allegations of conspiracy or the planning of unlawful acts, except that all Answering Defendants deny any allegations of a conspiracy .

83. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except that all Answering Defendants deny any allegations of a conspiracy .
84. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations except that all Answering Defendants deny any allegations of a conspiracy and admit they are aware of the Charlottesville statement but aver that the statement speaks for itself.
85. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, deny as factually inaccurate allegations of conspiracy or the planning of unlawful acts , and aver that the Daily Stormer speaks for itself.
86. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, deny as factually inaccurate allegations of conspiracy or the planning of unlawful acts, and aver that altright.com speaks for itself.
87. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate allegations of conspiracy or the planning of unlawful acts as. to themselves.

88. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate allegations of conspiracy or the planning of unlawful acts.
89. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, deny as factually inaccurate allegations of conspiracy or the planning of unlawful acts , but TWP admits it created or distributed the referenced poster and avers that the poster speaks for itself.
90. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate allegations of conspiracy or the planning of unlawful acts.
91. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, deny as factually inaccurate allegations of conspiracy or the planning of unlawful acts, and aver that the Daily Stormer and altright.com speak for themselves and not for defendant Identity Evropa.
92. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate allegations of conspiracy or the planning of unlawful acts.

93. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate allegations of conspiracy or the planning of unlawful acts.
94. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, deny as factually inaccurate allegations of conspiracy or the planning of unlawful acts, and aver the poster speaks for itself including as to the identity of its creator and uploader.
95. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, deny as factually inaccurate allegations of conspiracy or the planning of unlawful acts as to themselves, and aver publicly released Discord logs speak for themselves.
96. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate allegations of conspiracy or the planning of unlawful acts,
97. Answering Defendants deny as factually inaccurate the allegations of conspiracy or the planning of, or acquiescence in, unlawful acts in this paragraph.
98. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that

basis, deny those allegations, and deny as factually inaccurate the allegations of conspiracy or the planning of unlawful acts in this paragraph.

99. Answering Defendants admit this document exists and was circulated, deny as factually inaccurate the allegations of conspiracy or the planning of unlawful acts in this paragraph, and aver that the document speaks for itself.

100. Answering Defendants deny as factually inaccurate the allegations of conspiracy or the planning of unlawful acts in this paragraph and aver that the referenced document speaks for itself.

101. Denied as factually inaccurate as to the Answering Defendants.

102. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph , and aver that any such posting speaks for itself.

103. Answering Defendants deny as factually inaccurate the allegations of conspiracy or the planning of unlawful acts in this paragraph and aver that the postings speak for themselves.

104. Answering Defendants deny as factually inaccurate the allegations of conspiracy or the planning of unlawful acts in this paragraph and aver that the postings speak for themselves.

105. Answering Defendants deny as factually inaccurate the allegations of conspiracy or the planning of unlawful acts in this paragraph and aver that the postings speak for themselves.

106. Answering Defendants deny as factually inaccurate the allegations of conspiracy or the planning of unlawful acts in this paragraph and aver that the postings speak for themselves.

107. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph and aver that the postings speaks for themselves.

108. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph and aver that any such postings speaks for themselves.

109. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph and aver that any such posting speaks for itself.

110. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph and aver that any such posting speaks for itself.

111. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph and aver that any such posting speaks for itself but Jason Kessler admits he posted the indicated language or something similar but avers in was in the context of a self-defense centered discussion..

112. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph and aver that any such posting speaks for itself.

113. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph and aver that any such posting speaks for itself,

114. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph and aver that any such posting speaks for itself.

115. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph and aver that any such posting speaks for itself.

116. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph and aver that any such posting speaks for itself.

117. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph and aver that any such posting on Daily Stormer speaks for itself.

118. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph.

119. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations

of conspiracy or the planning of unlawful acts in this paragraph and aver that any such posting speaks for itself.

120. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph, and aver that any such posting speaks for itself.

121. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph, and aver that any such posting speaks for itself, but Jason Kessler admits to posting the referenced language or something similar.

122. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph, and aver the referenced poster speaks for itself.

123. Answering Defendants deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph and aver that any such internet posting speaks for itself.

124. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that

basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph, and aver that any such posting speaks for itself.

125. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph and aver that the Daily Stormer speaks for itself.

126. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph, and aver that any such posting or recorded communication speaks for itself.

127. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph, and aver that any such posting speaks for itself.

128. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph, and aver that any such posting or podcast speaks for itself.

129. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph, and aver that any such posting speaks for itself, but Jason Kessler admits he discussed a possible parking and shuttle plan with Tyrone but denies that plan was actually used.

130. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy the planning, intending, or committing of unlawful acts in this paragraph.

131. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning of unlawful acts in this paragraph, and aver that any such permits speak for themselves.

132. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

133. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

134. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph and aver that any such posting speaks for itself. Jason Kessler specifically denies the allegations regarding his intent in this paragraph.

135. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph and aver that any such posting speaks for itself.

136. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph and aver that any such voice chat speaks for itself.

137. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that

basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts and aver that the claim based on this paragraph has been dismissed.

138. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts and aver that the claim based on this paragraph has been dismissed.

139. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph and aver that any such store signs speak for themselves.

140. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph and aver that any such posting or store signs speak for themselves.

141. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph and aver that any such letters speak for themselves.

142. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph, but Jason Kessler, admits he participated in planning and did attend said torchlight march.

143. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph but Jason Kessler admits the march was not publicized generally but specifically denies proper government authority was not told about and fully briefed on said march. It is further admitted Jason Kessler's rally permit was for August 12.

144. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph, but Jason Kessler admits there was lawful coordination on Discord and avers the Discord speaks for itself.

145. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations

of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph and aver the Daily Stormer speaks for itself.

146. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph, aver that Discord call recordings speak for themselves, but Jason Kessler admits he made the statements indicated or something similar.

147. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph, but Jason Kessler admits the instruction indicated is substantially accurate.

148. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph, and aver that Discord postings speak for themselves.

149. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations

of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph, and aver that Discord or internet posts speak for themselves.

150. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph and state the Vice documentary speaks for itself.

151. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph and aver the Discord posts speak for themselves.

152. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

153. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.

154. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.

155. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.

156. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph, and Jason Kessler denies he issued any unlawful orders to anybody on August 11 during the torchlight march but admits he heard chanting and barking which was impressively noisy.

157. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Jason Kessler specifically denies they took a circuitous route to threaten, intimidate, or harass bystanders.

158. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Jason Kessler denies issuing any unlawful instructions at any time that evening and further denies carrying a radio or wearing an earpiece.

159. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

160. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

161. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph except that Jason Kessler admits he heard barking.

162. Answering Defendants deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

163. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this

paragraph. Answering Defendants aver there is publicly available video of this portion of the march and it speaks for itself.

164. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver there is publicly available video of this portion of the march and it speaks for itself but admit that Richard Spencer appears in said video.

165. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver there is publicly available video of this portion of the march and it speaks for itself and that Discord or twitter posts speak for themselves.

166. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver there is publicly available video of this portion of the march and it speaks for itself.

167. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver there is publicly available video of this portion of the march and it speaks for itself.

168. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver there is publicly available video of this portion of the march and it speaks for itself.

169. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver there is publicly available video of this portion of the march and it speaks for itself.

170. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this

paragraph. Answering Defendants aver there is publicly available video of this portion of the march and it speaks for itself.

171. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver there is publicly available video and pictures of this portion of the march and they speak for themselves. Answering defendants further aver that any violence was started by the alleged victims not by the marchers and any Answering Defendant actions were lawful.

172. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver there is publicly available video of this portion of the march and it speaks for itself.

173. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver there is publicly available video of this portion of the march and it speaks for itself.

174. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver there is publicly available video of this portion of the march and it speaks for itself but admit that Richard Spencer appears in the video.

175. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver there is publicly available video of this portion of the march and it speaks for itself.

176. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph and aver that any such video speaks for itself.

177. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.

178. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that

basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

179. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

180. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

181. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.

182. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph, and aver that the internet post speaks for itself.

183. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that

basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver that internet posts speak for themselves.

184. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver that internet posts speak for themselves.

185. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver that internet posts speak for themselves.

186. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph except that it is admitted Unite the Right occurred on August 12, 2017.

187. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver there is publicly available video of this event and that it speaks for itself and that statements on the internet or video speak for themselves. Jason Kessler admits he made the statement attributed to him or something similar.

188. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver that internet or video posts speak for themselves.

189. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver that Discord posts speak for themselves. Jason Kessler specifically denies as factually inaccurate the allegation in the last sentence of this paragraph.

190. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that

basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver that Discord chats speak for themselves.

191. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver that Discord logs speak for themselves.

192. Answering Defendants deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

193. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts, or of failure to follow instructions from or agreement with law enforcement in this paragraph, and Jason Kessler, Matt Parrott, and TWP deny there was any intentional failure to follow a plan by the Charlottesville Police or other government agencies for safety of marchers.

194. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations

of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver there is video of this rally and said video speaks for itself.

195. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Parrott and TWP admit they marched with other groups which likely included at least some of the entities alleged.

196. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

197. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph except that it is admitted that persons known to Answering Defendants as League of the South members were present on August 12.

198. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations

of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

199. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. TWP admits the description of it's members and activities in this paragraph is substantially accurate.

200. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants aver there is publicly available video of this portion of the march that contains the quoted language but further aver that none of them expressed said language and that context given in Plaintiffs complaint is entirely inaccurate based on the video.

201. This paragraph was dismissed and does not require a response. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

202. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that

basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

203. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.

204. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations.

205. Answering Defendants deny that they knowingly worked in concert with persons carrying firearms but admit that such were present. Answering Defendants admit Plaintiff Wispelwey was present and locking arms with his cohorts. Other than as admitted in this paragraph Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

206. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

207. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. TWP admits that Wispelwey and the others were moved out of the way but deny “pushed to the ground” or “knocked into a bush” and aver that this occurred only after a Charlottesville police officer told co-defendant Michael Hill that the police could not do anything about Wispelwey and others blocking the road and so the marchers would have to walk through them. Further, it is denied that any Answering Defendant made the statement to Wispelwey or heard it made.

208. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants further aver that this allegation is not even consistent with statements made by Wispelwey to media.

209. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

210. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Further, it is specifically denied that any Answering defendant spit on or caused to be spit on Plaintiff Romero.

211. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph, except Matt Parrott admits he made the statements and published the articles attributed to him. TWP and Parrott admit they helped to form a “shield wall”.

212. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

213. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this

paragraph except that Matt Parrott admits he made the statement attributed to him or something similar.

214. Answering Defendants deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.
215. Answering Defendants deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.
216. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.
217. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.
218. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

219. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

220. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts or of “common tactics” in this paragraph.

221. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

222. Admitted.

223. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, except it is admitted that state of emergency was announced by police officers around 11:28 a.m.

224. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations

of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

225. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph except it is admitted Jason Kessler directed people to go to McIntire Park and some persons loaded into vans.

226. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

227. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph and further deny the statements alleged are admissions of any unlawful conduct except Mr. Parrott admits he did not leave the park immediately upon being told to do so and was therefore arrested.

228. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations

of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

229. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

230. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

231. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

232. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

233. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

234. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

235. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

236. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Jason Kessler admits the attached picture is accurate.

237. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations

of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Jason Kessler admits the attached picture is accurate.

238. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

239. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

240. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Jason Kessler admits the indicated post is accurate.

241. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering defendants admit they are aware Fields has been convicted of murder for actions taken in Charlottesville on August 12, 2017.

242. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

243. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

244. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

245. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

246. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations

of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

247. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Answering Defendants admit they are aware James Fields has been convicted of murdering Heather Heyer.

248. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

249. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

250. This paragraph does not require a response.

251. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations

of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

252. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

253. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

254. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

255. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

256. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

257. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

258. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

259. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

260. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations

of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph. Jason Kessler admits retweeting the Richard Spencer tweet.

261. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

262. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph.

263. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, or committing of unlawful acts in this paragraph or it's footnote.

264. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

265. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

266. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

267. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph. Jason Kessler admits he made tweet in question and later withdrew it with the alleged explanation or one substantially similar.

268. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph. Matt Parrott admits Heimbach made the statements alleged or something similar.

269. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

270. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

271. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

272. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

273. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations

of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

274. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

275. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

276. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

277. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

278. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph. It is admitted that Heather Heyer, Lt. H. Jay Cullen, and Trooper Pilot Berke M.M. Yates died on August 12.

279. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

280. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

281. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

282. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that

basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

283. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

284. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

285. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

286. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

287. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

288. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

289. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

290. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

291. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations

of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

292. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

293. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

294. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

295. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

296. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

297. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

298. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

299. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

300. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations

of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph. Jason Kessler admits making the indicated comment.

301. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

302. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

303. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

304. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

305. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

306. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph. Jason Kessler admits applying for a permit.

307. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph. Answering Defendants admit they attempted to raise funds for legal defense in a similar manner to that used to defray event expenses for a short time.

308. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

309. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

310. Answering Defendants deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph. Defendants Damigo and IE admit they tried to raise legal defense funds substantially as alleged.

311. Answering Defendants deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph except they admit the Robert E. Lee statue issue was relevant to the decision to rally in Charlottesville.

312. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

313. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

314. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

315. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

316. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

317. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

318. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations

of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

319. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

320. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

321. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph. Kessler, IE, and TWP specifically deny they were on Discord or knowingly had any members on Discord engaged in any unlawful conduct.

322. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations

of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

323. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph. Jason Kessler denies the allegations in this paragraph as factually inaccurate.

324. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph..

325. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph. Kessler admits he made some effort to raise funds and arrange transportation but denies all other allegations in this paragraph.

326. Admitted.

327. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations

of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph. Jason Kessler denies all allegations in this paragraph as factually inaccurate.

328. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph. Jason Kessler denies all allegations in this paragraph as factually inaccurate except he admits he participated in the torch march.

329. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph. Answering Defendants admit they are aware Mr. Cantwell was convicted of misdemeanor offenses relating to facts alleged in this paragraph.

330. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

331. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that

basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

332. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

333. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

334. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph but they admit they are aware James Fields was

convicted of murder based on his conduct in Charlottesville on August 12, 2017.

335. Answering Defendants incorporate herein all previous admissions and denials.

336. Answering Defendants deny they are liable to plaintiffs or any one of them.

337. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

338. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

339. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

340. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that

basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

341. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

342. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

343. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph and further deny they are liable to the plaintiffs or any one of them.

344. Answering Defendants incorporate herein all previous admissions and denials.

345. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that

basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

346. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

347. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

348. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

349. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful

acts in this paragraph, and further deny they are liable to the plaintiffs or any one of them.

350. Answering Defendants incorporate herein all previous admissions and denials.

351. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph and all it's subparts.

352. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

353. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph and further deny they are liable to the plaintiffs or any one of them.

354. Answering Defendants incorporate herein all previous admissions and denials.

355. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

356. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

357. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

358. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

359. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations

of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

360. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

361. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph and further deny they are liable to the plaintiffs or any one of them.

362. Answering Defendants incorporate herein all previous admissions and denials.

363. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

364. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations

of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

365. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph and further deny they are liable to the plaintiffs or any one of them.

366. Answering Defendants incorporate herein all previous admissions and denials.

367. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph and further deny they are liable to the plaintiffs or any one of them.

368. Answering Defendants incorporate herein all previous admissions and denials.

369. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful

acts in this paragraph, and further deny they are liable to the plaintiffs or any one of them.

370. Answering Defendants incorporate herein all previous admissions and denials.

371. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

372. Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and deny as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph and further deny they are liable to the plaintiffs or any one of them.

#### AFFIRMATIVE DEFENSES

373. Assumption of the Risk: in that Plaintiffs assumed and unreasonably disregarded the risk their actions would result in their own personal injury;

374. Contributory Negligence: in that Plaintiffs actions were partly or wholly the cause of their claimed injuries;

375. Duress: In that Defendants claimed actions were taken in self defense while defendants were being unlawfully assaulted or otherwise mistreated.

376. Illegality: In that Plaintiffs actions were unlawful and Plaintiffs misconduct is itself the proximate cause of their injuries;

377. Anything not specifically and explicitly admitted as true in this answer is denied.

378. Defendants give notice that they are reserving the right to assert additional defenses as such become known to them.

WHEREFORE, having fully answered the Plaintiffs Amended Complaint, Answering Defendants request the Court dismiss this action with prejudice.

Respectfully Submitted,

s/ Elmer Woodard  
ELMER WOODARD (VSB 27734)  
5661 US Hwy 29  
Blairs, Va. 24527  
(434) 878-3422  
[isuecrooks@comcast.net](mailto:isuecrooks@comcast.net)  
*Trial Attorney for Defendants*

S/ James E. Kolenich (PHV)  
KOLENICH LAW OFFICE  
9435 Waterstone Blvd. #140  
Cincinnati OH 45249  
Phone: 513.444.2150  
Fax: 513.297.6065  
e-mail: [Jek318@gmail.com](mailto:Jek318@gmail.com)  
*Trial Attorney for Defendants*

CERTIFICATE OF SERVICE

I hereby certify the above was served via the Court's ECF system on October 1, 2019 upon:

All parties of record. No party is entitled to or has requested service by other means except as listed below:

Via email as listed on the docket:

Elliott Kline

Dillon Hopper

s/ **James Kolenich**

---

J. Kolenich (PHV)